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Attorneys For Defendant Portfolio Recovery Associates, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JESSICA SCHEDENECK,)	CASE NO. 2:22-cv-01348-GMN-NJK
)	
Plaintiff,)	MOTION FOR EXTENSION OF
)	TIME TO FILE RESPONSE TO
vs.)	COMPLAINT
)	
PORTFOLIO RECOVERY ASSOCIATES, LLC)	(Third Request)
)	
Defendant.)	
)	

Pursuant to Local Rule IA 6-1, Defendant Portfolio Recovery Associates, LLC (“PRA”) by and through its attorney, Philip Lo of Gordon Rees Scully Mansukhani, LLP hereby submits the following:

1. Pursuant to the second extension of time granted on October 20, 2022 (Dkt. 9), PRA’s responsive pleading is due November 2, 2022.
2. As indicated in PRA’s Stipulation to Extend Time to File Response to Complaint (Second Request) (Dkt. 8), PRA sought a second extension of time to conclude settlement discussions for a full resolution of this matter. (Dkt. 8, para. 7.)
3. The parties have reached a full resolution of the case. *See* Notice of Settlement dated October 31, 2022 (“NOS”) (Dkt. 10.)
4. The NOS states that Plaintiff anticipates filing dismissal documents within 60 days. (*See* Dkt. 10.)

1 5. Based on the foregoing and in light of the NOS, PRA requests an additional
2 continuance of 45 days, through December 17, 2022, of the responsive pleading deadline.

3 6. Good cause exists, as this extension is sought to allow the parties to conclude
4 resolution of the case pursuant to the NOS, and without incurring unnecessary fees and costs.

5 7. This motion is made in good faith and is not intended to inflict unnecessary delay.

6 8. Pursuant to this Court's local rules, a proposed Order has been attached hereto as
7 Exhibit A.

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9
10 DATED November 2, 2022.

11 Respectfully submitted,

12 GORDON REES SCULLY MANSUKHANI,
13 LLP

14 By: /s/ Philip Lo
15 Philip Lo
16 Attorneys for Defendant
17 Portfolio Recovery Associates, LLC

18
19 IT IS SO ORDERED.
20 Dated: November 3, 2022

21 .
22 .
23 _____
24 Nancy J. Koppe
25 United States Magistrate Judge
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27
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